

EXHIBIT G

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

In Re:

Bair Hugger Forced Air Warming
Products Liability Litigation

This Document Relates To:

All Actions

MDL No.

15-2666 (JNE/FLN)

VIDEOTAPED DEPOSITION

OF

SCOTT D. AUGUSTINE, M.D.

Minneapolis, Minnesota

Friday, March 31, 2017

Reported by:

Amy L. Larson, RPR

Job No. 121237

1 AUGUSTINE

2 previously-mentioned study that has been
3 accepted for publication in a major journal,
4 Forced-Air Warming and Ultraclean Ventilation
5 Do Not Mix: An Investigation of Theater
6 Ventilation, Patient Warming, Joint
7 Replacement Infection in Orthopedics
8 attachment 3, includes the following sentence
9 in the abstract, Bair Hugger patient
10 ventilation disruption was associated with a
11 significant increase in deep joint infections
12 demonstrated by an elevated infection odds
13 ratio, 3.8, P equals 0.028, forced air versus
14 conductive patient" -- "conductive fabric
15 patient groups, N equals 1437 cases, 2.5 year
16 period."

17 Did I read that correctly?

18 A. Yes.

19 Q. You go on to say to 3M, "Research results
20 from another hospital, which have also been
21 submitted for publication, show that the deep
22 joint infection rates dropped by 81 percent
23 after switching from Bair Hugger to HotDog
24 warming." Did I read that correctly?

25 A. Yes.

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2 Q. That refers to Ridgeview, right?

3 A. Yes.

4 Q. And where was this submitted for publication?

5 A. That was actually being prepared for
6 submission.

7 Q. So when you told 3M, "We have also been
8 submitting" -- "We have also been submitted
9 for publication" -- excuse me.

10 When you told 3M that, "These
11 results from another hospital," meaning
12 Ridgeview, "have also been submitted for
13 publication," that wasn't actually true?

14 A. We were a little ahead of ourselves, yes.

15 Q. Yeah, okay.

16 And you go on to say that, "Similar
17 studies are being conducted in numerous other
18 hospitals. We are confident that we will see
19 similar drops in orthopedic deep joint
20 infection rates repeated over and over. We
21 will continue to submit these results for
22 publication in peer-reviewed journals." Did
23 I read that correctly?

24 A. Yes.

25 Q. So we're not quite seven years after this

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2 letter to Ms. Rectenwald. How many
3 publications have you submitted to
4 peer-reviewed journals that show a similar
5 drop in orthopedic deep joint infection
6 rates?

7 A. Just one more so far.

8 Q. What's that one?

9 A. The one that I submitted not too long ago.

10 Q. Is that the pooled -- the three center study
11 that included Ridgeview?

12 A. Yes.

13 Q. Okay. Where did you submit that?

14 A. You know, I'd prefer not to tell you, because
15 3M has a way of strong-arming. It'll be
16 published soon enough, you can just wait for
17 it to come out.

18 Q. Has it been accepted for publication?

19 A. Yes.

20 Q. Then why do you -- what's your concern if
21 it's already been accepted for publication?

22 A. Because it's never too late for 3M to
23 intervene.

24 Q. Okay. Other than this document that has been
25 accepted for publication in a periodic which